

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DORIS M. JACKSON, Pharm.D.,

Plaintiff,

v.

TEXAS SOUTHERN UNIVERSITY.

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Civil Action No. 4:11-cv-04092

PLAINTIFF JACKSON'S INITIAL DISCLOSURES

Plaintiff Doris M. Jackson makes the following initial disclosures in compliance with the provisions of Rule 26(a)(1).

1. Name, address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the plaintiff might use to support his claims, other than that which might be used solely for impeachment.

A. Students wrongfully treated by Defendant, for whom Plaintiff advocated

A1. Frank North, Pharm.D., 1155 Lehman Street, Houston, TX 77018, Phone 713.409.9699. Dr. Jackson was Dr. North's academic advisor and persistently advocated for Dr. North and protested mistreatment and harassment of Dr. North, as a consequence of which Dr. Jackson was retaliated against, in violation of her rights under the Fifth and Fourteenth Amendments to the United States Constitution.

A2-26. Other students for whom Dr. Jackson advocated and protested mistreatment, contact information for whom is available to the Defendant from its records: William Hamilton, Augustine Oyeka, Henry North, Rachael Osuji-Stewart, Alise North, Obiamaka Nwazojie, Jim Varghese, Njoku O. Darlington, Randall Larson, Dat Nguyen, Tamara Moore, Ouyen Nguyen, Tanasha Montgomery, Chibundu Ahunanya, Thu Le, Brian Haney, Dawnia Richard, Alicia Dial, Cynthia Miller, Jessica Johnson, Beatrice Anyanwu, T. J. Lin, Terence Turner, George Okpamen, Lekan Giwa, Ayodotun Sodipe, Austin Onyeka.

B. Faculty whose academic qualifications for promotion Plaintiff questioned and challenged.

B1-9. Plaintiff challenged the academic qualifications for promotion of Dong Liang, Barbara Hayes, Kingsley Okafor, Amruthesh Shivachar, Ivy Chui Poon, Darego Maclayton, Cyril Abobo, Aisha Morris Moultry, Golda Leonard, Sondip Mathur.

B10-32. Plaintiff made Public Information Act request for information as to qualifications and promotion and tenure procedure of Anita Kalunta-Crumpton, Qisheng Pan, Luis A. Perez-Feliciano, Holim Song, Chris Beineman, Alexis Brooks de Vita, Marylise Caussin, Maria del Carmen Garcia, Annie M. Morgan, Delores Vantrice Oates, Golda Anne Kevetter Leonard, Darego O. Maclayton, Renard L. Thomas, Hector Miranda Jr., Yi Qi, Fiengxiang Qiao, Shishir Shishodia, Alamelu Sundaresan, Kwadwo Ofori-Brobby, Kun Wang, Vera Walker-Hawkins, Kamile N. Wolff.

C. Others Connected to Texas Southern University

C1. Dr. Mofolorunso A. Enigbokan was familiar with Plaintiff, her advocacy activities and expressions, and commented that Plaintiff should be commended, not scapegoated.

C2-11. The Board of Regents of Texas Southern University, as a corporate body and individually, before whom Plaintiff appeared several times to advocate on matters of interest to the public.

C12-20. The individuals listed in the Defendant's initial disclosures, some of whom are previously listed herein.

D. Plaintiff's Treating Physicians

D1. Victor Simms, M.D., M.P.H., F.A.C.P., 3508 East Pasadena Fwy., Pasadena, TX 77503-1101, Telephone 713.442.7100, internist who treated Plaintiff, confirmed her incapacity to work, and submitted FMLA forms.

D2. Theodore T. Otey, M.D., 2510 Broad St., Houston, TX 77087, Telephone 713.522.7087, internist.

D3. Jeffrey Rochen, M.D., 3508 East Pasadena Fwy., Pasadena, TX 77503-1101, Telephone 713.442-7100, endocrinologist.

D4. James H. Young Jr., M.D., St. Joseph Medical Center, 2000 Crawford, Suite 780, Houston, TX 77002, Telephone 713.759.0852, cardiologist.

D5. David E. Mouton, M.D., Kelsey-Seybold West Clinic, 1111 Augusta Drive, Houston, TX 77057, 713.442.2400, internist and practitioner of nuclear imaging medicine.

D6. Javed Rehman, M.D., Kelsey-Seybold Clinic, St. Luke's Medical Tower-19th Floor, 6624 Fannin, Houston, TX 77030, internist.

D7. Rossie J. Gomez, D.P.M., 3402 Dowling St., Suite 102, Houston, TX 77004, podiatrist.

2. A description by category and location of all documents, electronically stored information, and tangible things that the plaintiff has in his possession, custody and control and might use to his claims, other than those that might be used solely for impeachment.

Documents in the following categories are being maintained at the offices of David T. Lopez & Assoc., 3900 Montrose Boulevard, Houston, Texas.

E. Documents pertaining to Dr. Jackson's medical leave.

F. Documents pertaining to Dr. Jackson's complaint to the Commission on Colleges of the Southern Association of Colleges and Schools.

G. Documents pertaining to Dr. Jackson's investigation and documentation of improprieties and failings in the administration of the Texas Southern University pharmacy program.

H. Documents pertaining to requests by Dr. Jackson for information under the Texas Public Information Act.

I. Documents pertaining to communications related to Dr. Jackson's concerns and complaints.

3. A computation of each category of damages claimed by the plaintiff and any documents or other evidentiary material on which each computation is based which are not protected from disclosure.

Dr. Jackson's damages are continuing, and an initial computation will be prepared and provided at the time that Dr. Jackson returns to her faculty duties at Texas Southern University. The categories of damages include lost pay and benefits, physical and emotional distress, cost of medical services and medications, damages to Dr. Jackson's reputation, damages to Dr. Jackson's earning capacity, and damages to Dr. Jackson's enjoyment of life. Dr. Jackson additionally will make claim for attorney's fees and costs of this litigation.

4. Any insurance agreement related to any potential judgment or providing for indemnification of reimbursement for payment made in accordance with a judgment.

Dr. Jackson has no insurance agreement related to any potential judgment in this case.

Respectfully submitted,

David T. López
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OF COUNSEL:

DAVID T. LOPEZ & ASSOC.

CERTIFICATE OF SERVICE

I certify that the above submission was served on the attorney-in-charge for the defendant, utilizing the court's ECF service, on this 26th day of April, 2012.

DAVID T. LÓPEZ
Attorney-in-Charge for Plaintiff